

PRELIMINARY ASSESSMENT  
NEW YORK AIR BRAKE COMPANY

PREPARED UNDER

**FILE COPY**

TECHNICAL DIRECTIVE DOCUMENT NO. 02-8710-42  
CONTRACT NO. 68-01-7346

**COMPLETED**

FOR THE

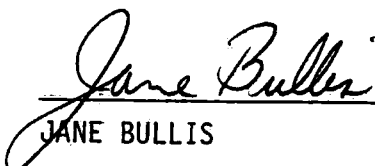
ENVIRONMENTAL SERVICES DIVISION  
U.S. ENVIRONMENTAL PROTECTION AGENCY

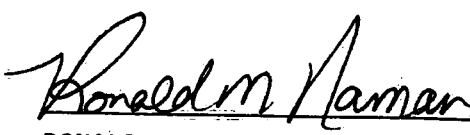
DECEMBER 14, 1987

NUS CORPORATION  
SUPERFUND DIVISION

SUBMITTED BY

REVIEWED/APPROVED BY

  
JANE BULLIS  
PROJECT MANAGER

  
RONALD M. NAMAN  
FIT OFFICE MANAGER

337892





02-8710-42-PA  
Rev. No. 0

**POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT**

<u>New York Air Brake Co.</u>	<u>NYD002235216</u>
<b>Site Name</b>	<b>EPA Site ID Number</b>
<u>Starbuck Ave, Watertown, NY 13601</u>	<u>02-8710-42</u>
<b>Address</b>	<b>TDD Number</b>

---

**Date of Site Visit:** Off-Site Reconnaissance: November 2, 1987

**SITE DESCRIPTION**

New York Air Brake Company is located on Starbuck Ave., Watertown, Jefferson County, New York. The site encompasses approximately 2 acres outside the limits of the city. Most of the property is covered with buildings.

New York Air Brake Company manufactures railroad brakes, hydraulic pumps, and motors. The production of these products requires a wide array of chemicals to be used. There are 3 waste streams that are formed by the processes which include foundry molding and casting, caustic and acid precleaning for finishing lines, and spray painting. (Continued)

**PRIORITY FOR FURTHER ACTION:** High        Medium        No Further Action   Y  

**RECOMMENDATIONS**

No further action is recommended as the company has an EPA-approved pretreatment process to remove hazardous waste from its discharge water. New York Air Brake's sanitary and industrial wastewater is discharged into the city sewer. The town of Watertown initiates routine inspections and sampling of the discharge water to insure compliance with its SPDES permit.

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**Prepared by:** Jane Bullis  
of NUS Corporation

**Date:** November 30, 1987

(CONT'D)

**SITE DESCRIPTION**

The company has an EPA-approved pretreatment process to remove hazardous waste before it is discharged to the city sewer. N.Y. Air Brake does not have a formal permit from the city for this discharge although they have worked in accordance with them. The city routinely inspects and samples the plant to insure compliance with their SPDES permit.



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION  
01 STATE 02 SITE NUMBER  
NY D002235216

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) New York Air Brake Company		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER Starbuck Ave.			
03 CITY Watertown	04 STATE NY	05 ZIP CODE 13601	06 COUNTY Jefferson	07 COUNTY CODE 45	08 CONG DIST 26
09 COORDINATES LATITUDE 4 30 59' 10" N		LONGITUDE 0 75 05 4' 00" W			

10 DIRECTIONS TO SITE (Starting from nearest public road)

Follow Route 81 north to Watertown. Take Route 3 East to Pearl Street, follow Pearl Street to Starbuck Ave., make left, site is on the right.

III. RESPONSIBLE PARTIES

01 OWNER (If known) New York Air Brake Company		02 STREET (Business, mailing, residential) Starbuck Ave.			
03 CITY Watertown	04 STATE NY	05 ZIP CODE 13601	06 TELEPHONE NUMBER (315) 782-7000		
07 OPERATOR (If known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ( )		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: \_\_\_\_/\_\_\_\_/\_\_\_\_ ☒ B. UNCONTROLLED WASTE SITE (CERCLA 103 d) DATE RECEIVED: 6/5/81 ☐ C. NONE  
MONTH DAY YEAR MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

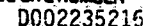
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 3/11/80 <input type="checkbox"/> NO MONTH DAY YEAR		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1900 Still Active <input type="checkbox"/> UNKNOWN BEGINNING YEAR ENDING YEAR			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED The following substances have been used in the manufacturing process: trichloroethylene, perchlorethylene, toluene, xylene, styrene, phenol-formaldehyde, polymeric isocyanate and triethylamine.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The above-mentioned substances may have been improperly stored or disposed of, resulting in contamination of soil or groundwater.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)  
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Diana Messina		02 OF (Agency/Organization) U.S. EPA Region 2, Edison, N.J.		03 TELEPHONE NUMBER (201) 321-6776	
04 PERSON RESPONSIBLE FOR ASSESSMENT Jane Bullis		05 AGENCY NUS Corp.	06 ORGANIZATION FIT 2	07 TELEPHONE NUMBER (201) 225-6160	08 DATE 11/25/87 MONTH DAY YEAR



- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

02-8710-42-PA  
Rev. No. 0



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
NY D002235216

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

There is no potential for flora damage, as the site is nearly void of vegetation. The facility is comprised of buildings and paved parking lots.

01 ☐ K. DAMAGE TO FAUNA

04 NARRATIVE DESCRIPTION (include names of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

The site is entirely fenced which prevents fauna from coming in contact with the site. It is unlikely that runoff from the site would threaten local fauna.

01 ☐ L. CONTAMINATION OF FOOD CHAIN

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

No potential exists for the contamination of the food chain.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES

(Solidification/stabilization liquid/sludge residues)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

Containment practices of the site are unknown, although the City of Watertown has not filed any grievances against them.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

Because the facility's operations are totally enclosed and the property is level, the potential for wastes to migrate off site via surface runoff is low. The city sewer department monitors waste that is discharged into the sewer.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

N.Y. Air Brake Co. is permitted to discharge its sanitary and pretreated industrial waste into the city sewer. The Watertown Sewerage Treatment Plant has a SPDES permit that the facility must comply with.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

There is no evidence of illegal or unauthorized dumping occurring at the site.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

All known hazards are mentioned above.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 1700

IV. COMMENTS

None

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, records)

Telecon note: Conversation between Ann Rice, NYSDEC, Regulatory Affairs Office Region 6, and Jane Bullis, NUS Corp., December 9, 1987.

Telecon note: Conversation between Tom Morgan, NYSDEC, Regulatory Affairs Office, (See Attachment)



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE NY 02 SITE NUMBER D002235216

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

The potential for groundwater contamination is non-existent as N.Y. Air Brake Co. regulates waste generated from the site. All waste is discharged into the city sewer. Any spills on site would occur inside the company's building where the waste would be contained.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

There is no evidence that indicates the site has discharged waste into the unnamed tributary adjacent to the site. All waste is pretreated then sent to the city treatment facility.

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

During the off-site reconnaissance conducted by NUS, an emission of black smoke was observed. Background information states that the company has an Air 100 emissions Point Registration Number. All other waste is confined to inside the building.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

The facility is maintained and operated to minimize fire, explosion or releases which could threaten workers or the environment.

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: 1700 04 NARRATIVE DESCRIPTION

The potential exists for the workers of N.Y. Air Brake Co. to have direct contact with filter cakes and wastewater, although there seems to be regular monitoring of the health and safety of the workers.

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

All waste is generated and handled inside of the production facility; therefore, the potential for soil contamination is non-existent.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

The city of Watertown utilizes the Black River as a source for drinking water. The river is located north of the city, upgradient from the site.

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

The potential exists for the workers of N.Y. Air Brake Co. to have direct contact with filter cakes and wastewater, although there seems to be regular monitoring of the health and safety of the workers.

01 ☒ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_ 04 NARRATIVE DESCRIPTION

The site is entirely fenced with a gate at the entrance which limits outside injury and population exposure. Once inside the fence, the potential is still low, as the treatment system is totally enclosed.

**(ATTACHMENT)**

**V. SOURCES OF INFORMATION** (Cite specific references, e.g. state files, sample analysis, reports)

Region 6, and Jane Bullis, NUS Corp., December 9, 1987.

Telecon note: Conversation between Mike Sligar, City Engineer, Watertown, N.Y., and Jane Bullis, NUS Corp., December 9, 1987.

New York State Hazardous Waste Survey, Department of Environmental Conservation, Albany, 3/31/78.

New York State Department of Environmental Conservation Order on Consent to N.Y. Air Brake Co., Draft 11/86.

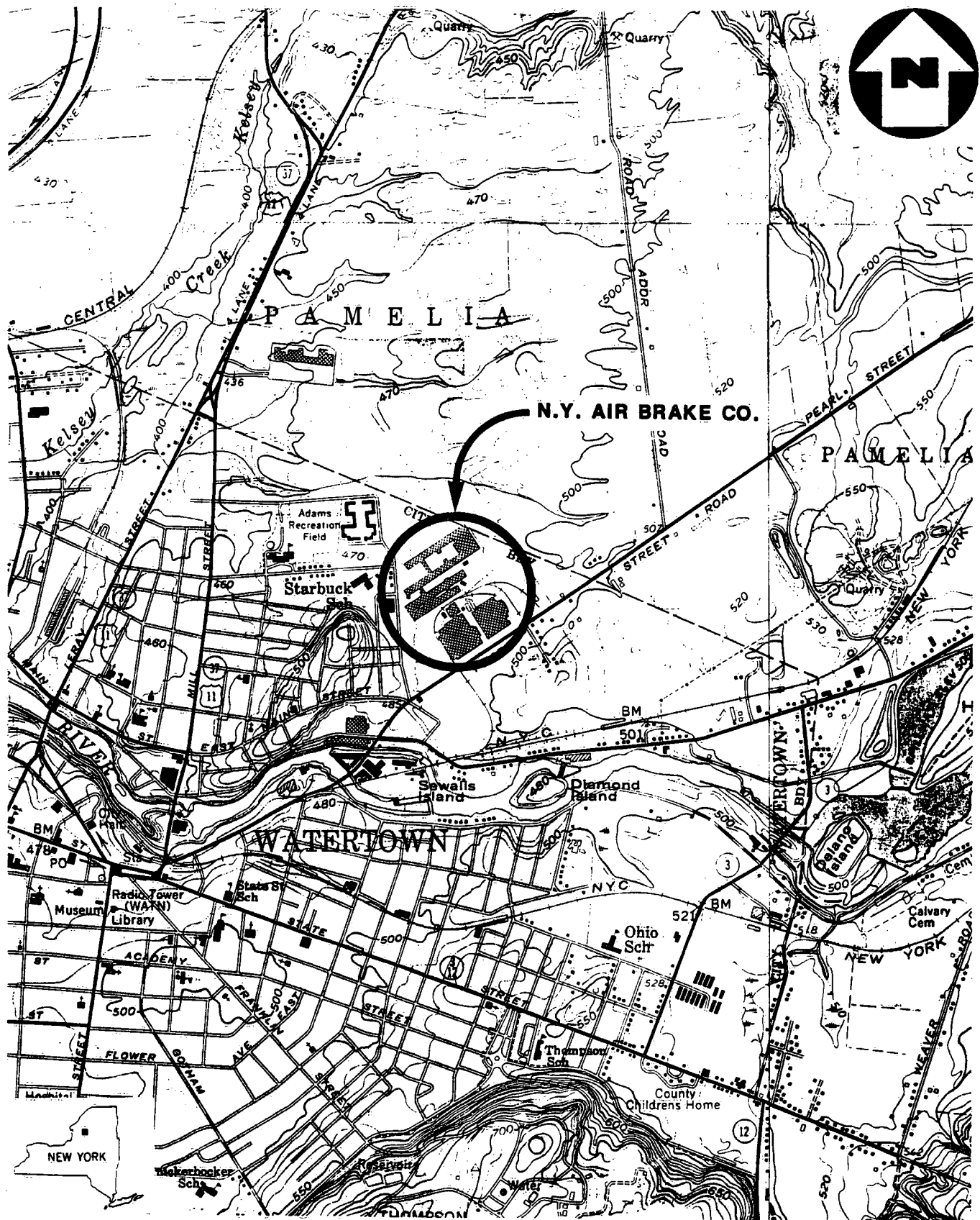
General Sciences Corporation, Graphical Exposure Modeling Systems (GEMS). Landover, Maryland, 1986.

NUS Corp. Region 2 FIT off-site inspection conducted on November 2, 1987, TDD No. 02-8710-42.

New York State Department of Health Division of Environmental Protection Bureau of Public Water Supply Protection, New York State Atlas of Community Water System Sources, 1982.



**APPENDIX A**  
**MAPS AND PHOTOGRAPHS**



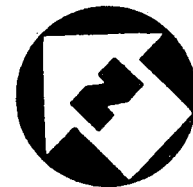
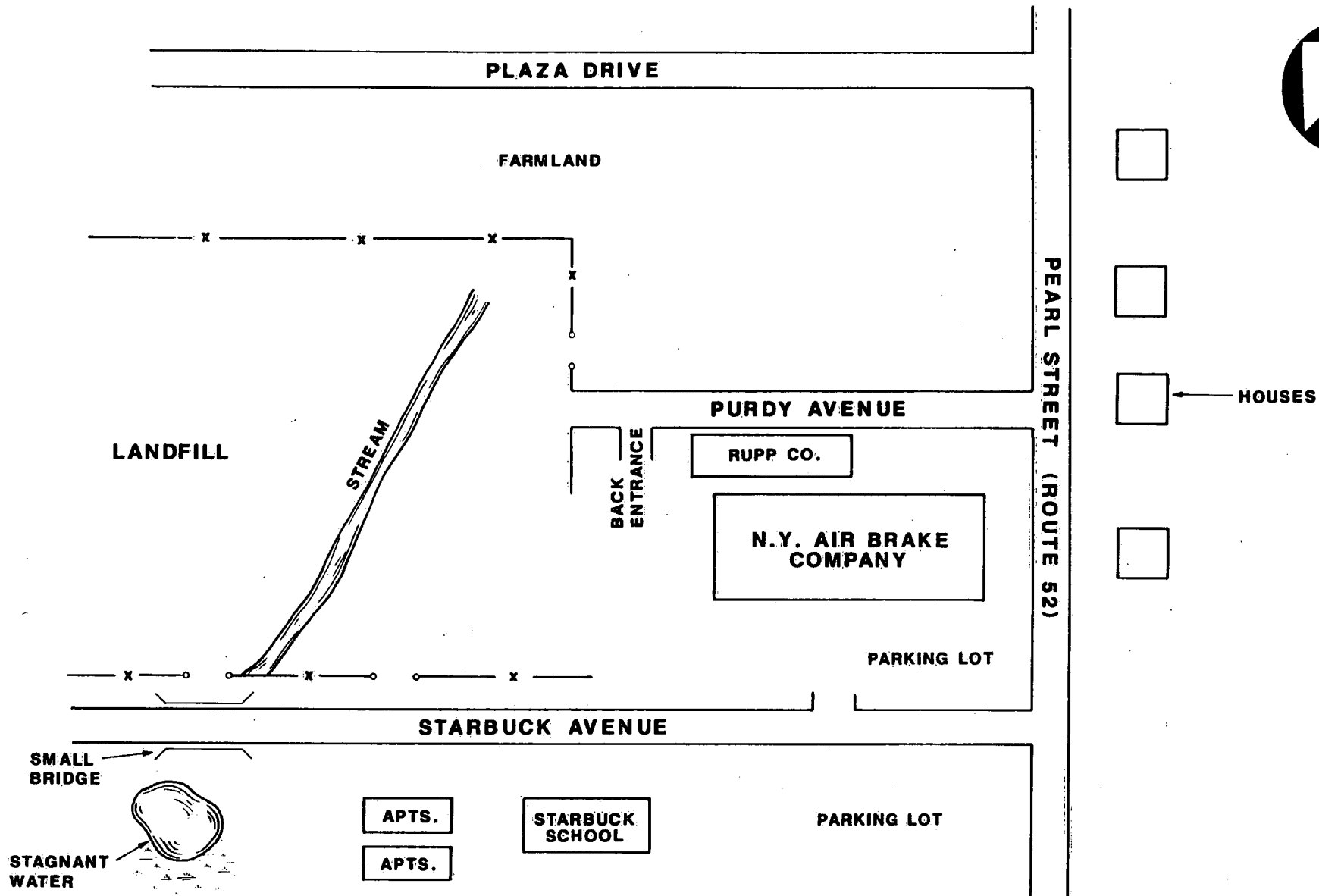
(QUAD) WATERTOWN, N.Y.

**SITE LOCATION MAP**  
**N.Y. AIR BRAKE CO., WATERTOWN, N.Y.**

SCALE : 1" = 2000'

**FIGURE 1**





**SITE MAP**  
**N.Y. AIR BRAKE CO., WATERTOWN, N.Y.**  
 (NOT TO SCALE)

EXHIBIT A  
PHOTOGRAPH LOG  
NEW YORK AIR BRAKE CO.  
WATERTOWN, NEW YORK

OFF-SITE RECONNAISSANCE: November 2, 1987

NEW YORK AIR BRAKE CO.  
WATERTOWN, NEW YORK

PHOTOGRAPH INDEX  
November 2, 1987

<u>Photo Number</u>	<u>Description</u>	<u>Time</u>
1P-11	Looking east at N.Y. Air Brake Co. smoke stacks.	1520
1P-12	Looking east at N.Y. Air Brake Co. parking lot.	1521
1P-13	Looking north east at N.Y. Air Brake Co. parking lot.	1522
1P-15	Looking north at entrance gate for N.Y. Air Brake Co.	1540

All photographs taken by Jane Bullis.



1P-13

November 2, 1987

1522

Looking north east at N.Y. Air Brake Co. parking lot.

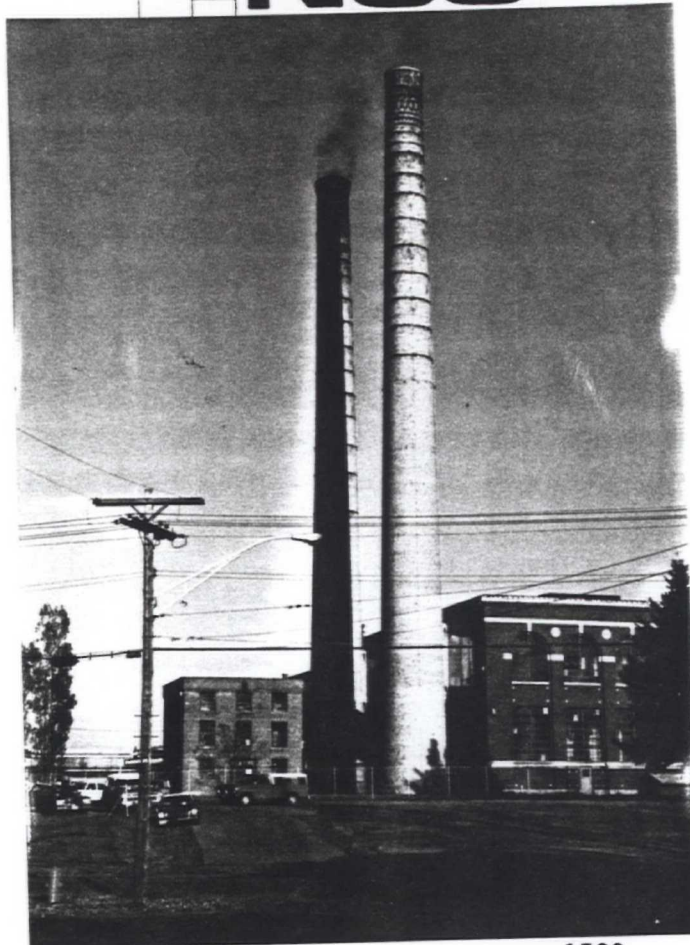


1P-15

November 2, 1987

1540

Looking north at entrance gate for N.Y. Air Brake Co.



1P-11

November 2, 1987 1520  
Looking east at N.Y. Air Brake Co. smoke stacks.

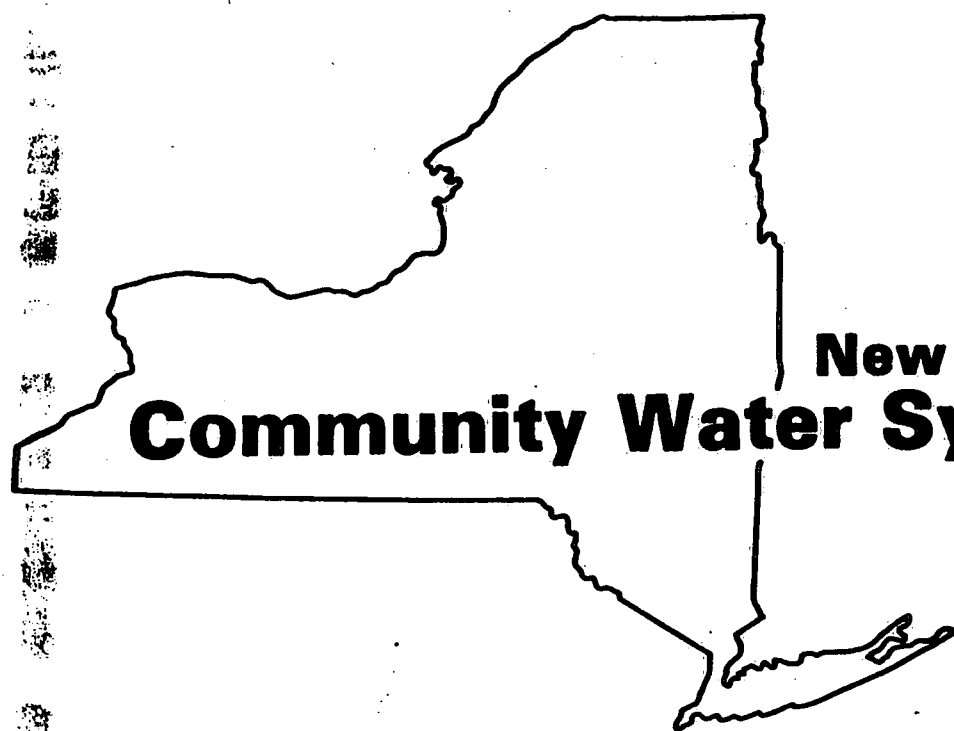


1P-12

November 2, 1987 1521  
Looking east at N.Y. Air Brake Co. parking lot.

**APPENDIX B**  
**BACKGROUND**





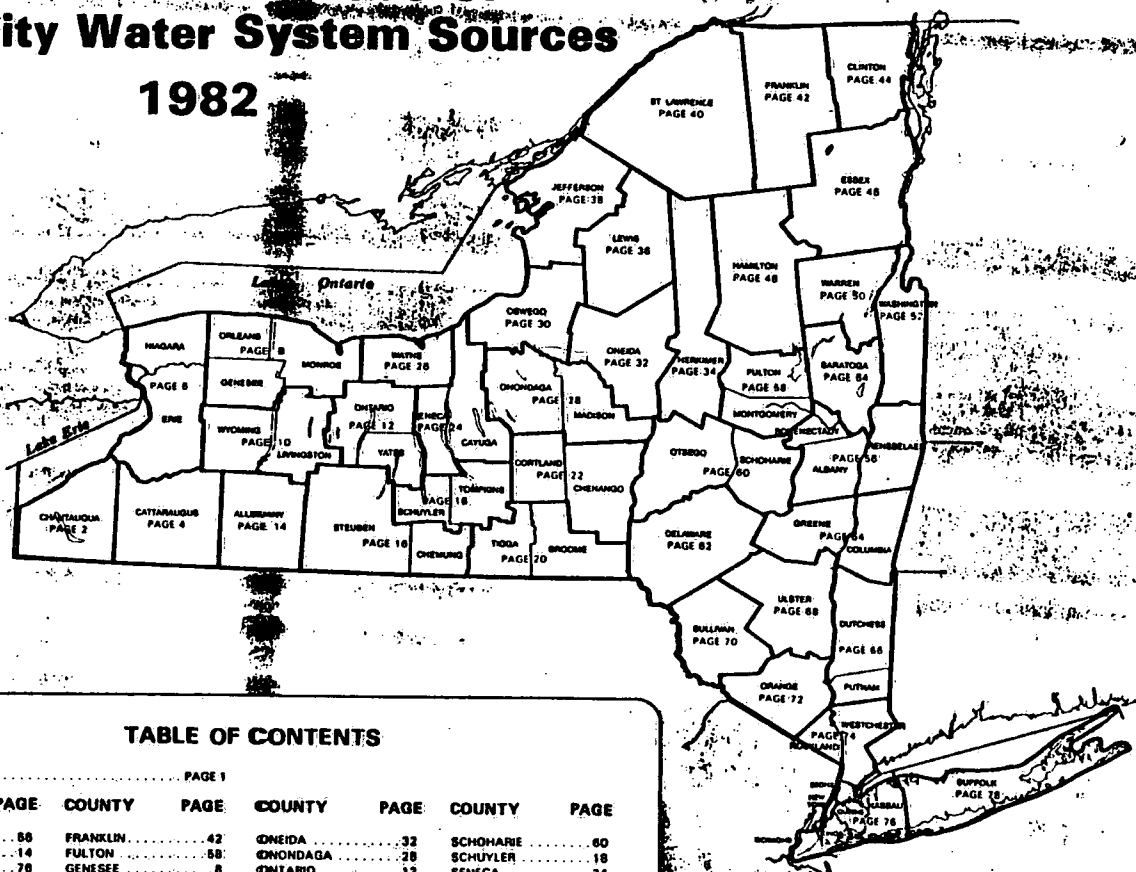
**New York State Atlas of  
Community Water System Sources  
1982**

**NEW YORK STATE DEPARTMENT OF HEALTH  
DIVISION OF ENVIRONMENTAL PROTECTION  
BUREAU OF PUBLIC WATER SUPPLY PROTECTION**

# New York State Atlas of Community Water System Sources

NEW YORK STATE  
DEPARTMENT OF HEALTH

1982



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ESSEX	48	NIAGARA	6	SCHENECTADY	66	YATES	12

## LEGEND

### BOUNDARIES AND PLACES

International	-----
State	-----
County	-----
Town	-----
Indian Reservation	-----
City	-----
Village	-----
Unincorporated Place	-----
Federal Reservation	-----
Built-up Area (Over 25,000 population, including any contiguous city or village)	-----

### CLASSIFICATION OF POPULATED PLACES

100,000 or more	YONKERS
50,000 to 100,000	Levittown
12,500 to 50,000	Poughkeepsie
2,500 to 12,500	Hampton Bays
250 to 2,500	Bocsville
250 or less	Cornell

### TRANSPORTATION

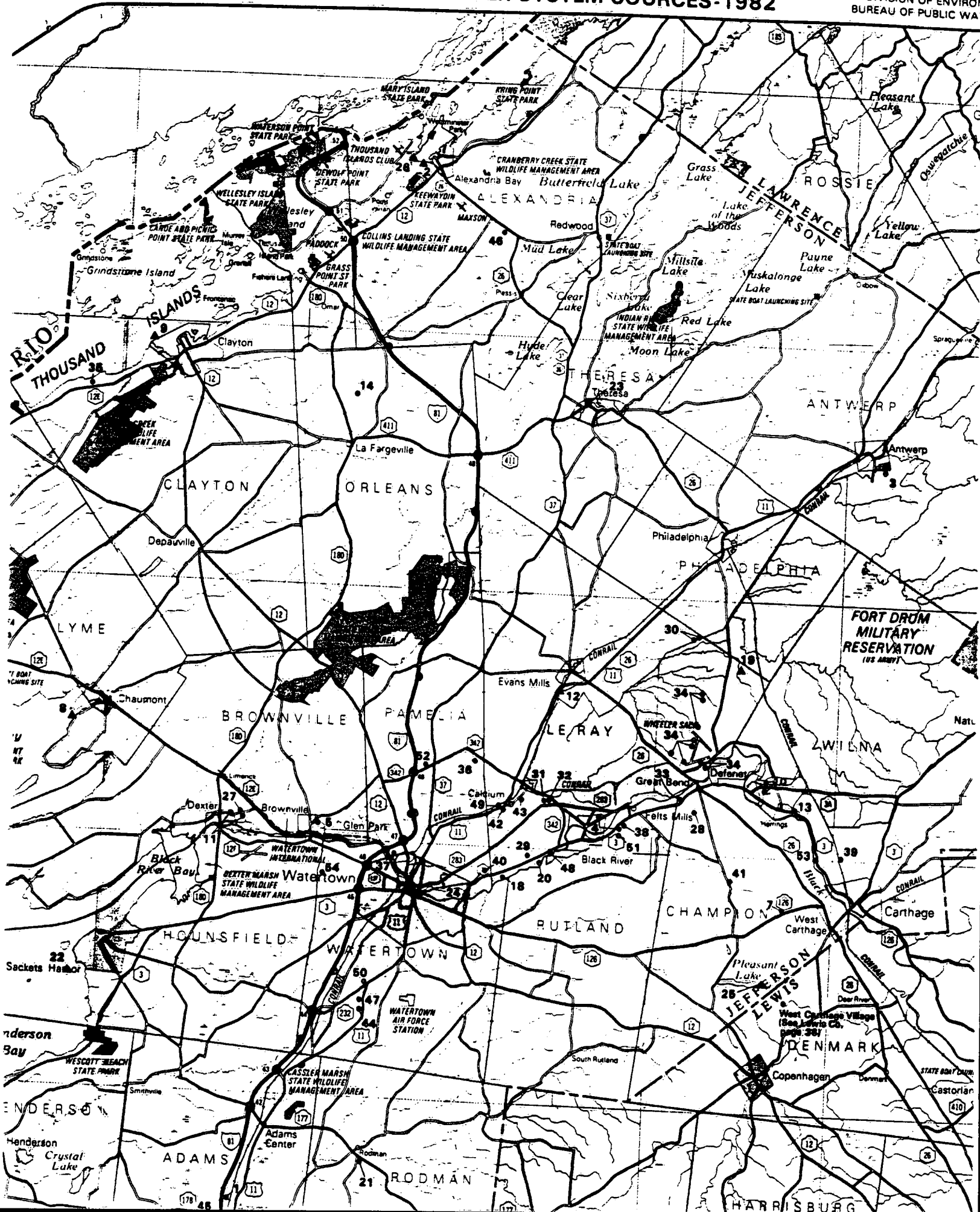
Highways	
Divided Highways	-----
Full Control of Access	-----
Partial or No Control of Access	-----
Undivided Highway	-----
Interchange	-----
Touring Route (State, U.S., Interstate) or State Parkway	-----
Touring Route Markers	-----
State, U.S., Interstate	-----
Railroads	
Operating Line	-----
Service Discontinued	-----
Operator	-----
Owner (If Other than Operator)	-----
Company Having Trackage Rights	-----
Airports (Open to the Public, Military)	
Runway under 4000'	-----
Runway over 4000'	-----
Rest Areas	
Food, Gas, Rest Rooms	-----
Gas, Rest Rooms	-----
Rest Rooms	-----
Parking Only	-----

### RECREATION FACILITIES

State or National Recreation Area	-----
State Campground	-----
State Boat Launching Site	-----
State Canal Park	-----
State Fish Hatchery	-----
Other State Recreation Site	-----

# LOCATION OF COMMUNITY WATER SYSTEM SOURCES-1982

NEW YORK STATE DE  
DIVISION OF ENVIRO  
BUREAU OF PUBLIC WA



# JEFFERSON COUNTY

ID NO	COMMUNITY WATER SYSTEM	POPULATION	SOURCE
<b>Municipal Community</b>			
1	Adams Village.	1957.	Wells (Infiltration Gallery)
2	Alexandria Bay Village.	1900.	St. Lawrence River
3	Antwerp Village.	950.	Wells (Springs)
4	Black River Village.	1290.	Wells (Springs)
5	Brownville Village.	1500.	Wells
6	Cape Vicent Village.	750.	St. Lawrence River
	Carthage Village (See No 1, Lewis Co, Page 36).	4500	
7	Champion Hill Subdivision.	31.	Wells
8	Chaumont Village.	550.	Lake Ontario
9	Clayton Village.	2300.	St. Lawrence River
10	Deferiet Village.	350.	Wells
11	Dexter Village.	1070.	Wells
12	Evans Mills Village.	715.	West Creek
13	Herrings Village.	150.	Wells
14	LaFargeville Water District.	500.	Wells
15	Mannsville Village.	576.	Wells
16	Natural Bridge Water Company East.	75.	Wells (Infiltration Gallery)
17	Natural Bridge Water Company West.	72.	Wells (Infiltration Gallery)
18	Patricia Drive Subdivision.	60.	Wells
19	Philadelphia Village.	900.	Reservoir
20	Riverbend Estates.	100.	Wells
21	Rodman Water Supply.	150.	Wells (Infiltration Gallery)
22	Sackets Harbor Village.	1200.	Lake Ontario
23	Theresa Village.	996.	Wells
24	Watertown City.	35000.	Black River
25	West Carthage Village (See also No 14 Lewis Co, Page 36).	2300.	Pleasant Lake
<b>Non-Municipal Community</b>			
26	Alexandria Bay USCG.	NA.	St. Lawrence River
27	Breezy Knoll Mobile Home Park.	90.	Wells
28	Bud's Trailer Court.	22.	Wells
29	Colonial Manor.	150.	Wells
30	Delles Mobile Home Park.	42.	Wells
31	Edgewood Court #1.	118.	Wells
32	Edgewood Court #2.	50.	Wells
33	Fairhaven Court.	22.	Wells
34	Fort Drum US Army Base.	5000.	Wells
35	Foxy's Trailer Park.	25.	Wells
36	Gardner's Mobile Home Park.	17.	Wells
37	Garland City Trailer Park.	100.	Wells
38	Gleasons Trailer Park.	30.	Wells
39	Hall's Mobile Home Park.	30.	Wells
40	Heather Acres.	100.	Wells
41	Hillside Trailer Park.	15.	Wells
42	Lake's Trailer Park.	180.	Wells
43	Leray Park.	20.	Wells
44	Northland Estates.	140.	Wells
45	Overton Trailer Park.	51.	Wells
46	Parker's Trailer Park.	20.	Wells
47	Pine Grove Mobile Village.	99.	Wells
48	Revera Trailer Park.	36.	Wells
49	Ridgedale Trailer Court.	83.	Wells
50	Rules Trailer Court.	33.	Wells
51	Sandy Pines Mobile Home Park.	NA.	Wells
52	Summit Trailer Court.	45.	Wells
53	Virkler Trailer Park.	12.	Wells
54	Walker's Mobile Home Park.	140.	Wells (Infiltration Gallery)

Data List of Dataset: NYAE      Number of Records = 6

REC #	POP	HOUSE	DISTANCE	SECTOR
1	4480	1671	0.400000	1
2	0	0	0.810000	1
3	5453	2236	1.600000	1
4	10665	3998	3.200000	1
5	4515	1622	4.800000	1
6	9106	3152	6.400000	1

Press RETURN to page forward, enter Pnnn to position the starting record  
of the next page, enter BACK to reselect variables, or enter END to stop  
? ""

CONTROL NO:

N7AE

DATE:

12/9/87

TIME:

0930

DISTRIBUTION:

Preliminary Assessment

N.Y. Air Brake Co.

BETWEEN:

Mike Sligar

OF:

Watertown  
City Engineer

PHONE:

(35) 785-7746

AND:

Jane Bullis

DISCUSSION:

Watertown's City Engineer stated that N.Y. Air Brake Co. does not have a formal permit for their discharge into the city's sewer system. A draft permit was issued 2 years ago although never validated. The company does not have a SPDES permit because they ~~comp~~ do not discharge directly into any surface water. The town has a SPDES permit (#0025984) which N.Y. Air Brake must comply. The city has not had any problems with the company complying with their designated limits. The city routinely conducts inspections and sampling to insure proper compliance.

ACTION ITEMS:

CONTROL NO:

W4AE

DATE:

12/9/87

TIME:

0915

DISTRIBUTION:

Preliminary Assessment N.Y. Air Brake Co.

BETWEEN:

Tom Morgan

OF: NYSDER Region 6  
Regulatory Affairs

PHONE:

(351) 785-2236

AND:

Jane Bullis

DISCUSSION:

Tom Morgan states that N.Y. Air Brake Co. is permitted to discharge their sanitary and pre-treated industrial waste into the city sewer. The landfill (N.Y. Air Brake) has a leachate collection system that was installed to remediate the site. This leachate collected from the landfill is also discharged into the city sewer.

N.Y. Air Brake does not have a permit for hazardous waste. They must remove any hazardous waste in less than 90 days.

ACTION ITEMS:

CONTROL NO:

N4AE

DATE:

12/9/87

TIME:

0900

DISTRIBUTION:

Preliminary Assessment N4 Air Brake Co.

BETWEEN:

Ann Rice

OF: NYDEC Region 6  
Regulatory Affairs

PHONE:

(315) 785-2236

AND:

Jane Bullis

DISCUSSION:

Ann Rice states that N.Y. Air Brake Co. has an approved pretreatment plan from the US EPA. The plating waste is treated before it is discharged into the city sewer. The main treatment is pH adjustment and chemical precipitation. Once the waste is collected it is hauled by a Hazardous Waste handler to a permitted landfill.

ACTION ITEMS:



Initial Mailing 10/20/77 by DMG  
Initial Contact 5/12/78 by DMG  
Appointment Made 1/1 by  
Site of Phone Visit 3/30/78 by DMG  
Follow-up 1/1 by  
Form Completed 3/30/78 by DMG

Company Code 3743341001

Company Name New York Air Brake Co.  
Address Unit of General Signal Corp.  
Starbuck Ave Watertown 13601  
County Jefferson Phone 518-737-7000

SIC Codes 1. 3714 3. 3714  
2. 3714 4. 3714

Comments: air brakes, hyd pumps, water transmission  
5 FORM comp.

3/31/78

New York State Hazardous Waste Survey  
Department of Environmental Conservation  
Division of Solid Waste Management  
50 Wolf Road, Albany, N.Y. 12233 Telephone: (518) 457-6605

### I. General Information

1. Company Name New York Air Brake Co.

Mailing Address Starbuck Ave Watertown, NY 13601  
Street City State Zip

Plant Location ☐ Same as above

Street City State Zip

2. If Subsidiary, Name of Parent Company Unit of General Signal Co.

3. Individual Responsible for Plant Operations P. Oscar Williamson  
Name

Title Pres. Phone

4. Individual Providing Information David C. Stanley  
Name

Title Asst. Mgr. Plant Eng. Phone

5. Department of Environmental Conservation Interviewer Daniel M. Quackenbush

6. Standard Industrial Classification (SIC) Codes for Principal Products

Group Name	SIC Code (4 Digit)	Approximate % of IX/Production / Value Added
a. Railroad Equipment	3743	85
b.		
c. Pumps & Pumping Equip.	3561	15
d.		

7. Processes Used at Plant

a. Foundry  
b. Blacksmithing  
c. Sheetmetalworking & Metal finishing - cold  
d. Welding  
e. Painting

8. Products

a. Railroad Air Brake Sets \*  
b. Hydraulic Pumps & Motors  
c.  
d.  
e.

Company Code 3743341001

Raw materials and other chemicals used in manufacturing processes.

- a. Pig Fe, Scrap Fe, Steel
- b. Alloys, & Inoculants (Si, S content)
- c. Scrap Rods - Veg. oil, Inoculants, pig iron
- d. Alloys, Fe, Scrap Fe, Scrap Oil
- e. Scrap Fe - mixed, scrap, high purity, low

- a. On Site Waste Water Treatment ☐ Yes ☒ No
- b. On Site Waste Water Treatment by July 1977 ☐ Yes ☒ No
- c. On Site Waste Water Treatment by July 1983 ☐ Yes ☒ No
- d. Industrial Sewer Discharge ☐ Yes ☒ No

e. SPDES No. \_\_\_\_\_ NPDES No. \_\_\_\_\_  
Name of Sewage Treatment Plant Wastewater City

- a. Air Pollution Control Devices ☒ Yes ☐ No Types Flue, Sulfur Dioxide, Nitrogen
- b. To Be Built ☒ Yes ☐ No by 8/1/75
- c. Air 100 Emission Point Registration Numbers 221800 0061 100 EPS

- a. Number of manufacturing employees 1700
- b. Manufacturing Floor Space 87,610 sq. ft.

- 3. Attach a plat or sketch of the facility showing the location of on-site process waste storage (if available).
- 4. Attach flow diagrams of chemical processes including waste flow outputs (if available).
- 5. In-house waste treatment capabilities: None at present, considering liquid waste neutralization system including on-site incineration and

- 6. Is there a currently used or abandoned landfill, dump or lagoon on plant property? ☒ Yes ☐ No
- 7. Industrial wastes produced or expected to be produced by plant.

- 1) Foundry Sand and Other Waste
- 2) Liquid Chemical Waste
- 3) Paint Filter Waste
- 4) Sewer Discharge to City of Wastewater
- 5) Liquid Wastes to Sewer
- 6) Solid Wastes to Landfill
- 7) Air Emissions to Atmosphere
- 8) Other

Comments: John Kenna of Reg. office has advised NY Air Bldg to come sampling liquid waste on site (for about 1/2 hr. The site has been having water (liquid). John Kenna has also taken no samples of formerly waste liquid area and has taken no return its site to stop current disposal practice

## II. Waste Characterization and Management Practice

(Use separate form for each waste stream)

1. Waste Stream No. 01 (from Form I, Number 17)
2. Description of process producing waste FOUNDARY MOLDING & CASTING  
SANDS ARE DISCARDED
3. Brief characterization of waste WASTE FOUNDARY SAND - NO PHENOLS
4. Time period for which data are representative Current Est. to
5. a. Annual waste production 3125 ☒ tons/yr. ☐ gal./yr.  
 b. Daily waste production 12.5 ☒ tons/day ☐ gal./day  
 c. Frequency of waste production: ☐ seasonal ☐ occasional ☒ continual  
☐ other (specify) \_\_\_\_\_
6. Waste Composition
  - a. Average percent solids \_\_\_\_\_ % b. pH range \_\_\_\_\_ to \_\_\_\_\_
  - c. Physical state: ☐ liquid, ☐ slurry, ☐ sludge, ☒ solid,  
☐ other (specify) \_\_\_\_\_
  - d. Component
 

	Average Concentration	<input type="checkbox"/> wet weight	<input type="checkbox"/> dry weight
* 1. <u>FOUNDARY MOLDING &amp; CORE BULK</u>	<u>SAND &amp; BINDERS</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
	<u>Black sand</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
	<u>Isocyanate cure</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
2. <u>granular waste from</u>	<u>Small %</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
	<u>foundry - Fe, Al, sand fines</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
	<u>from shot blast &amp; other</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
	<u>dust collectors</u>	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
7. _____	_____	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
8. _____	_____	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
9. _____	_____	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm
10. _____	_____	<input type="checkbox"/> wt.%	<input type="checkbox"/> ppm

\* SOURCE I-308  
 SOURCE II-608  
 Phenol-formaldehyde resin } DATA GOTTEN FROM

Company Code 3743341001

e. Analysis of composition is ☐ theoretical ☐ laboratory ☒ estimate  
(attach copy of laboratory analysis if available)

f. Projected ☐ increase, ☐ decrease in volume from base year: \_\_\_\_\_ % by July 1977;  
\_\_\_\_\_ % by July 1983.

g. Hazardous properties of waste: ☐ flammable ☐ toxic ☐ reactive ☐ explosive  
☐ corrosive ☒ other (specify) unknown

7. On Site Storage

a. Method: ☐ drum, ☐ roll-off container, ☐ tank, ☐ lagoon, ☐ other (specify) \_\_\_\_\_

b. Typical length of time waste stored 1 ☐ days, ☒ weeks, ☐ months

c. Typical volume of waste stored 12.5 ☒ tons, ☐ gallons

d. Is storage site diked? ☐ Yes ☒ No

e. Surface drainage collection ☐ Yes ☒ No

8. Transportation

a. Waste hauled off site by ☐ you ☐ others N/A

b. Name of waste hauler \_\_\_\_\_

Address

Street \_\_\_\_\_ City \_\_\_\_\_  
State \_\_\_\_\_ Zip Code \_\_\_\_\_ Phone \_\_\_\_\_

9. Treatment and Disposal

a. Treatment or disposal: ☒ on site ☐ off site

b. Waste is ☐ reclaimed ☐ treated ☒ land disposed ☐ incinerated  
☐ other (specify) \_\_\_\_\_

c. Off site facility receiving waste

Name of Facility \_\_\_\_\_

Facility Operator \_\_\_\_\_

Facility Location \_\_\_\_\_

Street \_\_\_\_\_ City \_\_\_\_\_  
State \_\_\_\_\_ Zip Code \_\_\_\_\_ Phone \_\_\_\_\_

## II. Waste Characterization and Management Practice

(Use separate form for each waste stream)

1. Waste Stream No. 12 (from Form I, Number 17)
2. Description of process producing waste Caustic & Acid precleaning in plating & other metal finishing lines, other plating & metal finishing wastes including chromating, Metal parts cleaning, machine lubrication, metal machining lubrication & others.
3. Brief characterization of waste Mixed Liquid Wastes  
Acid & Caustic Plating wastes, Tramp oils, coolants, & solvents.
4. Time period for which data are representative Current est. to \_\_\_\_\_
5. a. Annual waste production 270,000 ☐ tons/yr. ☒ gal./yr.  
b. Daily waste production 1125 ☐ tons/day ☒ gal./day  
c. Frequency of waste production: ☐ seasonal ☐ occasional ☒ continual  
☐ other (specify) \_\_\_\_\_

### 6. Waste Composition

- a. Average percent solids \_\_\_\_\_ % b. pH range \_\_\_\_\_ to \_\_\_\_\_
- c. Physical state: ☒ liquid, ☐ slurry, ☐ sludge, ☐ solid,  
☐ other (specify) \_\_\_\_\_

#### d. Component

- | Component   | Average Concentration | <input type="checkbox"/> wet weight       | <input type="checkbox"/> dry weight |
|---|-----------------------|---|-------------------------------------|
| <u>Preclean</u>   |                       |   |                                     |
| ① <u>Plating Wastes including strong &amp; weak acids &amp; caustics (NaOH), chromating wastes etc.</u> | <u>45</u>             | <input checked="" type="checkbox"/> wt. % | <input type="checkbox"/> ppm        |
| ② <u>Organic wastes i.e. waste solvents &amp; oils mineral spirits (bulk) trichloroethylene toluene</u> | <u>30</u>             | <input checked="" type="checkbox"/> wt. % | <input type="checkbox"/> ppm        |
| <u>transmission oil (Type A-Auto) (next lot organic)</u>  |                       | <input type="checkbox"/> wt. %            | <input type="checkbox"/> ppm        |
| ③ <u>H<sub>2</sub>O-Soluble Coolant (Master Chemical - biodegradable)</u>                               | <u>25</u>             | <input checked="" type="checkbox"/> wt. % | <input type="checkbox"/> ppm        |

Also, semi-quant analysis by Tri- exclusive of organic material

Na 10-100% Al 1-5%

Cr 0.1-50%

Cu "

K "

Sb, Ba, Bi, B, Ca

Mg, Mn, Mo, Ni, W, V, Zn

Ti, Co, Fe, Hg all

Company Code 2 7 7 3 3 4 1 0 0 1

e. Analysis of composition is ☐ theoretical ☐ laboratory ☒ estimate  
(attach copy of laboratory analysis if available)

f. Projected ☐ increase, ☐ decrease in volume from base year: \_\_\_\_\_ % by July 1977;  
\_\_\_\_\_ % by July 1983.

g. Hazardous properties of waste: ☒ flammable ☒ toxic ☐ reactive ☐ explosive  
☒ corrosive ☐ other (specify) \_\_\_\_\_

7. On Site Storage

a. Method: ☐ drum, ☐ roll-off container, ☒ tank, ☐ lagoon, ☐ other (specify) \_\_\_\_\_

b. Typical length of time waste stored 1-1 1/2 ☐ days, ☒ weeks, ☐ months

c. Typical volume of waste stored 6000 ☐ tons, ☒ gallons

d. Is storage site diked? ☐ Yes ☐ No

e. Surface drainage collection ☐ Yes ☐ No

} holding tank

8. Transportation

a. Waste hauled off site by ☐ you ☒ others

b. Name of waste hauler Tricel Waste Management Limited

Address

701 Evans Ave Toronto  
Street City  
Ontario (416) 621-9752  
State Zip Code Phone

9. Treatment and Disposal

a. Treatment or disposal: ☐ on site ☒ off site

b. Waste is ☐ reclaimed ☐ treated ☐ land disposed ☒ incinerated  
☐ other (specify) \_\_\_\_\_

c. Off site facility receiving waste

Name of Facility Tricel

Facility Operator \_\_\_\_\_

Facility Location \_\_\_\_\_

Quebec \_\_\_\_\_  
Street City  
State Zip Code Phone

II. Waste Characterization and Management Practice

(Use separate form for each waste stream)

1. Waste Stream No. 03 (from Form I, Number 17)
2. Description of process producing waste Spray Painting - Dry Filters  
collect paint solids
3. Brief characterization of waste Used paint filters
4. Time period for which data are representative Current est. to \_\_\_\_\_
5. a. Annual waste production 1.1 ☒ tons/yr. ☐ gal./yr.  
 b. Daily waste production N/A ☐ tons/day ☐ gal./day  
 c. Frequency of waste production: ☐ seasonal ☐ occasional ☐ continual  
☐ other (specify) 1/wk.
6. Waste Composition
  - a. Average percent solids \_\_\_\_\_ % b. pH range \_\_\_\_\_ to \_\_\_\_\_
  - c. Physical state: ☐ liquid, ☐ slurry, ☐ sludge, ☒ solid,  
☐ other (specify) \_\_\_\_\_
  - d. Component
 

	Average Concentration	<input type="checkbox"/> /wet weight <input type="checkbox"/> /dry weight
1. <u>BASIC BLACK PRIMER Solids</u>	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
2. <u>SOME BLACK ENAMEL</u>	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
3. <u>Toluene</u> <u>trace</u>	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
4. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
5. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
6. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
7. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
8. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
9. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	
10. _____	<input type="checkbox"/> wt.% <input type="checkbox"/> ppm	

Company Code 3 7 4 3 3 4 1 0 0 1

e. Analysis of composition is ☐ theoretical ☐ laboratory ☒ estimate  
(attach copy of laboratory analysis if available)

f. Projected ☐ increase, ☐ decrease in volume from base year: \_\_\_\_\_ % by July 1977;  
\_\_\_\_\_ % by July 1983.

g. Hazardous properties of waste: ☐ flammable ☐ toxic ☐ reactive ☐ explosive  
☐ corrosive ☒ other (specify) unknown

7. On Site Storage

a. Method: ☐ drum, ☒ roll-off container, ☐ tank, ☐ lagoon, ☐ other (specify) \_\_\_\_\_

b. Typical length of time waste stored 1-2 ☒ days, ☐ weeks, ☐ months

c. Typical volume of waste stored neg. ☐ tons, ☐ gallons.

d. Is storage site diked? ☐ Yes ☒ No

e. Surface drainage collection ☐ Yes ☒ No

8. Transportation

a. Waste hauled off site by ☐ you ☐ others N/A

b. Name of waste hauler \_\_\_\_\_

Address

Street \_\_\_\_\_

City

State \_\_\_\_\_ Zip Code \_\_\_\_\_ Phone \_\_\_\_\_

9. Treatment and Disposal

a. Treatment or disposal: ☒ on site ☐ off site

b. Waste is ☐ reclaimed ☐ treated ☒ land disposed ☐ incinerated  
☐ other (specify) \_\_\_\_\_

c. Off site facility receiving waste

Name of Facility \_\_\_\_\_

Facility Operator \_\_\_\_\_

Facility Location \_\_\_\_\_

Street \_\_\_\_\_

City

State \_\_\_\_\_ Zip Code \_\_\_\_\_ Phone \_\_\_\_\_



PLEASE COMPLETE AND RETURN TO THE ABOVE ADDRESS, ATTENTION: INDUSTRIAL CHEMICAL SURVEY.

ANY NAME

NEW YORK AIR BRAKE CO.		SIC CODE (if known) 3714		OFFICE USE ONLY 7773	
ANY MAILING ADDRESS Starbuck Ave.		CITY Watertown		STATE New York	
NAME (if different)		CONTACT NAME F. W. Denney, Supt. M. & C. Div		TELEPHONE Area (315) 782-7000	
ADDRESS (if different)		CITY		STATE	
PRINCIPAL BUSINESS OF PLANT				ZIP CODE	

Manufacturing railroad air brakes, hydraulic pumps & motors  
(If parent company, give name and addresses of all divisions, subsidiaries, etc. located in New York State. A separate questionnaire is to be completed and submitted for each.)

## PART II

- Discharge Information**

1. Does your plant discharge liquid wastes to a municipally owned sanitary sewer system?  
 Name of System City of Watertown ☒ Yes ☐ No

2. Is your facility permitted to discharge liquid wastes under a State (SPDES) or Federal (NPDES) permit? ☐ Yes ☒ No  
 Permit Number 0025924 ☒ Yes ☐ No

3. Do you discharge liquid wastes in any other manner? ☐ Yes ☒ No  
 Explain Non-contact cooling water & storm drainage to City storm sewers

If any of the above are "Yes":

a. Do you discharge process or chemical wastes — (i.e. water used in manufacturing including direct contact cooling water and scrubber water)? ☒ Yes ☐ No

b. Do you discharge non-contact cooling water? ☒ Yes ☐ No

c. Do you discharge collected storm drainage only? ☐ Yes ☒ No

d. Do you discharge sanitary wastes only? ☐ Yes ☒ No

1. Does your facility have sources of possible emissions to the atmosphere? ☒ Yes ☐ No

2. Enter Location and Facility Code as shown on your Air Pollution Control Application for Permits and Certification (If applicable) ☒ Yes ☐ No  
2218000062

1. List Name and Address of Firm (including yourself) removing wastes other than office and cafeteria refuse.

Name			
New York Air Brake Co.			
Address		City	State
Starbuck Avenue		Watertown	New York
Zip Code		13601	
Name			
Tricil Limitee			
Address		City	State
C. P. 59, Ville Ste-Catherine, Quebec Canada		JOLIEO	

2. List Location(s) of Landfill(s) owned and used by your facility.

1 Town of Pamela, Jefferson Co. N. Y.

1. Does this facility:

- |  |   |                              |  |
|--|---|------------------------------|--|
| Manufacture Pesticides or Pesticide Product Ingredients? | .....   | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Produce Pesticides or Pesticide Product Ingredients?     | .....   | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| Formulate Pesticides?                                    | .....   | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| Repackage Pesticides?                                    | .....   | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |
| Establishment Number                                     | <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> <div style="border: 1px solid black; display: inline-block; width: 15px; height: 15px;"></div> | <input type="checkbox"/> Yes | <input type="checkbox"/> No            |

2. EPA Establishment Number

77733

NAME OF SUBSTANCE	CODE	AVERAGE ANNUAL USAGE	AMOUNT NOW ON HAND	✓		PURPOSE OF USE (State whether produced, reacted, blended, packaged, distributed, no longer used, etc.)
				GAL.	LB.	
Trichlorethylene	A12	20,075	1595	X		Cleaning solvent for in-plant use.
Perchloroethylene	A22	2,640	110	X		Cleaning solvent for in-plant use.
Toluene	D02	15	110	X		Used as trial solvent only.
Xylene	D03	7,975	1265	X		Paint Thinner for product painting.
Styrene (Imprex 95-500 Resin)	D07	1,210	220	X		Resin sealant for control valve castings - Styrene content proprietary.
Phenol-formaldehyde Resin (Isocure I-308)	-	515	220	X		Three components mixed with sand to produce sand cores for Foundry castings.
Polymeric Isocyanate (Isocure II 608)	-	155	385	X		
Triethylamine (Isocure Catalyst 700)	-	227	110	X		

[illegible]

STRUCTURE (Owner, Partner, or Officer)

September 30, 1977

**TITLE**

7 11 December



## New York State Department of Environmental Conservation

## MEMORANDUM

Distribution <sup>NP</sup>  
TO: Norman Parratt  
FROM: New York Air Brake - Phase II Order  
SUBJECT: December 4, 1986  
DATE:

The most recent draft of the proposed New York Air Brake Order is attached. The Site is a 2a on the Registry and this Order takes us through a field investigation with the possibility of a further Consent Order is both parties agree upon the necessity of remedial action to be taken at the Site.

New York Air Brake put hazardous materials in their landfill between 1970 and 1977. An initial test of the leachate by the regional staff showed only very small concentrations of PCBs and no other hazardous wastes.

I am prepared to send this Order to New York Air Brake on December 15, 1986 and I would like your comments by December 12, 1986.

NP:cj

Attachment

Distribution:

D. Engel  
M. Millspaugh  
J. Iannotti  
D. Swerdowski, Region 6 ✓  
J. Drabicki, Region 6  
R. Tramontano, DOH

RECEIVED

DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
REGION 6  
REGIONAL ENGINEER



New York State Department of Environmental Conservation

MEMORANDUM

TO: Charles Goddard  
FROM: Darrell Sweredoski, Region 6  
SUBJECT: FIFTH ROUND, PHASE I SITE INVESTIGATION  
DATE: March 11, 1986

We have reviewed the list of sites proposed for Fifth Round Phase I Site Investigation and have the following comments.

✓ New York Air Brake Company - 623003

Dave Engel and his staff from the Division of Environmental Enforcement are currently seeking to negotiate a consent order with this company to perform an RI/FS. We are hopeful that such a study will be initiated soon.

Whitestown Municipal Landfill - 633013

The Bureau of Municipal Waste has awarded a contract to Dunn Geoscience for a Groundwater Contamination Assessment Study which began in December 1985. This information should be included in the Phase I investigation.

Please contact me if you have any other questions.

Darrell M. Sweredoski, P.E.  
Sr. Sanitary Engineer  
Region 6

DMS:kw

STATE OF NEW YORK: DEPARTMENT OF ENVIRONMENTAL CONSERVATION

---

In the Matter of a Field  
Investigation to Identify  
Any Threat to the Environment  
Caused by the Disposal of  
Industrial and Hazardous  
Wastes by

ORDER  
ON  
CONSENT

Index #T120486

NEW YORK AIR BRAKE COMPANY,

Respondent.

---

WHEREAS,

1. The New York State Department of Environmental Conservation (the "Department") is responsible for the enforcement of Article 27, Title 13, of the Environmental Conservation Law of the State of New York (the "ECL"), entitled "Inactive Hazardous Waste Disposal Sites".

2. New York Air Brake Company, (the "Respondent"), is a corporation organized and existing under the laws of the State of New York, and is doing business in the State of New York in that Respondent operates an air brake manufacturing facility in Watertown, New York.

3. Respondent owns and operates an industrial waste landfill (the "Site") at its property at Starbuck Avenue, Watertown, New York (the "Site"). A map of the Site is attached and is hereby incorporated into this Order as Appendix "A".

4. Hazardous wastes were disposed of at the Site between 1970 and 1977. The Site is presently classified on

the Department's Registry of New York State Inactive Hazardous Waste Disposal Sites (the "Registry") as a "2a" a site for which there is insufficient information to determine the significance of the threat, if any, posed by the Site to the public health or the environment.

5. The Department alleges that the hazardous wastes, constituents and degradation products thereof at the Site constitute a threat to the environment.

6. Pursuant to ECL §27-1305(4)(a), the Department "shall conduct investigations of the sites listed in the Registry... The purpose of these investigations shall be to develop the information required by subdivisions two (assessment of significance) and three (detailed site information)."

7. The Department and Respondent acknowledge that the goals of this Order shall be that Respondent:

a. Develop and implement a field investigation program to:

(i) determine the nature of the wastes and the areal and vertical extent and distribution of the wastes disposed of at the Site;

(ii) identify any past, current and/or potential releases or migration of hazardous wastes; and

(iii) evaluate the on-Site and identify potential off-Site impacts, if any, of the disposal, release and migration of hazardous wastes upon the environment.

b. If necessary, based upon the findings of the field

investigation, develop and implement an inactive hazardous waste disposal site remedial program, as that term is defined in ECL Section 27-1301(3), for the Site and for affected off-Site areas. The activities undertaken pursuant to the remedial program may include elimination, removal, abatement, controlling or monitoring any present or potential hazards to the environment and/or public health at the Site and at affected off-Site areas. The goal of the remedial program shall be the elimination of any significant threat to the environment and/or conditions dangerous to life or health posed by the disposal of hazardous wastes at the Site.

c. Undertake to meet the requirements for operation of the industrial/commercial landfill at the Site set forth in Appendix "D", Operation Requirements.

8. Respondent, having waived its right to a hearing herein as provided by law, and having consented to the issuance and entry of this Order, agrees to be bound by the provisions, terms and conditions hereof.

NOW, having considered this matter and being duly advised, IT IS ORDERED THAT:

I. All investigations, proposals, reports, plans, remedial programs, and supplements and revisions thereto required by this Order shall address both on-Site and off-Site contamination, if any, caused by the disposal of hazardous wastes at the Site, and shall be prepared, designed and executed in accordance with Requisite Technology. As used in this Order, Requisite Technology means engineering,

scientific and construction principles and practices subject to the Department's approval, which (a) are technologically feasible and cost effective, and (b) will most effectively eliminate, remove, abate, control or monitor, as appropriate, any present or potential future significant threat to the environment posed by the disposal of hazardous and industrial wastes at the Site.

The failure of Respondent to submit or undertake a proposal, report, field investigation, construction program plan or any supplement or revision thereof, required under this Order, which is in accordance with Requisite Technology shall constitute a violation of this Order.

II. As used herein, "hazardous wastes" shall mean hazardous wastes, as defined at 6 NYCRR 371, and any constituent or degradation products of such wastes which satisfy the definition of "hazardous wastes" or "hazardous constituents".

III. Respondent shall undertake a field investigation of the Site and identify off-Site areas, if any, potentially affected by the disposal of hazardous and industrial wastes (the "Field Investigation").

IV. Within forty-five (45) days after the effective date of this Order, Respondent shall submit to the Department a proposed written scope of the work (the "Proposal") outlining the nature and extent of the work to be undertaken in conducting the Field Investigation. At a minimum, the Proposal shall include:



a. A brief history and description of the Site, including, if known, the types, quantities, physical state and location of hazardous wastes disposed of, including spills, at the Site, and the dates and methods of disposal and spillage of such wastes;

b. A description of the results of all previous investigations of the Site and of investigations known by Respondent to have been conducted of areas in the vicinity of the Site, including an inventory of all topographic and property surveys and engineering reports or plans;

c. A historical inventory of all aerial photography available for the Site, and in Respondent's possession or concerning which Respondent has knowledge, including date of flight, area of coverage, scale of reprints, and present owner of photography;

d. The methods and procedures by which the types, quantities and the areal and vertical extent of hazardous waste present on-Site and the methods and procedures by which potentially affected off-Site areas shall be identified.

e. The methods by which the hydrogeological conditions at and in the vicinity of the Site shall be determined, to include, but not be limited to:

1. Locations for and number of exploratory borings and groundwater monitoring wells;
2. Instrument surveys and geophysical methods;
3. Groundwater, surface water, soil, sediment, sludge, and waste sampling and analysis;

4. Procurement and review of historical data, including climatological and land use records;

5. Hydrogeologic testing (aquifer pump tests, permeability testing, etc.); and

6. Piezometric monitoring;

f. The methods which shall be utilized to determine the past, present and potential release and migration of hazardous wastes, from the Site, and from locations in the vicinity of the Site, to include the number, location and types of samples to be collected and the specific analytical procedures and protocols to be employed and followed on each sample;

g. An identification of all households, persons, and industries in the vicinity of the Site who utilize private wells as a source of drinking, household, or irrigation water;

h. A time schedule for the initiation and completion of the Field Investigation and submission of a Report to the Department; and

i. A health and safety plan for the protection of persons at and in the vicinity of the Site during the performance of the Field Investigation. Such plan shall satisfy all state and federal rules and regulations regarding occupational safety and health.

V. Within thirty (30) days after receipt of the Proposal, the Department shall provide at least one opportunity for its representatives to meet with Respondent's

representatives to discuss, address, if possible, concerns or questions the Department may have regarding the Proposal.

Within forty-five (45) days after the receipt of the Proposal, The Department shall provide written notification to Respondent of its approval or disapproval of the Proposal. If the Department approves the Proposal, Respondent shall perform the Field Investigation in accordance with the Proposal.

If the Department disapproves the Proposal, the Department shall notify Respondent in writing of the Department's objections. Within thirty (30) days after receipt of notice of disapproval, Respondent shall revise the Proposal in accordance with the terms, provisions and conditions of this Order and shall submit to the Department a proposal which has been revised in accordance with the Department's objections (the "Revised Proposal").

Within fifteen (15) days after receipt of the Revised Proposal, the Department shall provide written notification to Respondent of its approval or disapproval of the Revised Proposal. If the Department approves the Revised Proposal, Respondent shall perform the Remedial Investigation in accordance with the Revised Proposal.

If the Department disapproves the Revised Proposal, the Respondent shall be in violation of this Order, not having submitted an approvable proposal in accordance with the terms of this Order.

The Department shall not unreasonably withhold its

approval of the Proposal or the Revised Proposal and, in its review, shall be guided by generally accepted scientific practices and principles.

The approved Proposal or the approved Revised Proposal shall be attached hereto as Appendix "B". Such Proposal shall hereafter be referred to as the "Approved Proposal".

VI. Within the time schedule set forth in the Approved Proposal, Respondent shall submit to the Department a Field Investigation Report (the "Report") founded upon its performance of the Field Investigation in accordance with the Approved Proposal. The Report shall include a copy of the Approved Proposal, and all data generated, and all other information obtained, during the Field Investigation and shall also include, but shall not be limited to, the following specific information with respect to the Site and areas affected by the disposal of hazardous and industrial wastes at the Site:

a. A topographic survey and a resultant plot plan, including establishment of on-Site benchmarks;

b. A summary of environmental conditions, including, but not limited to: annual and seasonal climatological conditions, drainage, water balance, stream flow data, wildlife habitats, land use, soil conditions, hydrogeologic characteristics, surface and groundwater quality and air quality; said summary to include maps, tables, graphics, and any other appropriate means of presenting all information;

c. All data collected during the Field Investigation

and/or used in preparing the Report, including, but not limited to: exploratory boring logs, monitoring well details and the results of chemical analyses performed on samples obtained during the Field Investigation; said data presented to be presented in tabulated and/or graphic form where appropriate;

d. An estimation of the types and quantities of hazardous wastes present, as well as the areal and vertical extent of such wastes, which estimation shall result in the preparation of a waste location and concentration map and cross-section of the waste disposal area;

e. A study and evaluation of the hydrogeologic conditions at and in the vicinity of the Site;

f. Results of all instrument and geophysical survey work conducted at the Site;

g. A determination of the nature and extent of actual and potential release and migration of hazardous wastes from the Site through surface water, groundwater, air, soil and sediment to other on-Site or off-Site areas;

h. A determination of the extent to which both on-Site and off-Site surface water, groundwater, air, soil, sediment and biota have been, are being or may be contaminated by hazardous wastes;

i. An assessment of the results of the Field Investigation and a determination of the current or potential impacts of any significant threat to the environment which exists, or may exist in the future, at the Site or off-Site,

as a result of the hazardous and industrial wastes disposed of at the Site;

j. References to all scientific or technical literature used in the preparation of the Report; and

k. Names, titles and disciplines of all professionals engaged in the preparation of the Report.

VII. The Department reserves the right to request a modification and/or an amplification and expansion of the Field Investigation and Report by Respondent to address specific on-Site or off-Site areas if the Department determines that further investigation is necessary, as a result of reviewing data generated by the Field Investigation or as a result of reviewing other data or facts.

VIII. Within thirty (30) days after its receipt of the Report, the Department shall provide at least one opportunity for its representatives to meet with Respondent's representatives to discuss, address, if possible, concerns or question the Department may have regarding the Report.

Within forty-five (45) days after receipt of the Report, the Department shall provide written notification to Respondent of its approval or disapproval. If the Department disapproves the Report, Respondent shall revise and resubmit the Report within thirty (30) days of receipt of the Department's notification (the "Revised Report").

Within fifteen (15) days of receipt of the Revised Report, the Department shall provide written notification to Respondent of its approval or disapproval. If the Department:

disapproves the Revised Report, Respondent shall be in violation of this Order, not having submitted an approvable Report in accordance with the terms of this Order.

The Department shall not unreasonably withhold its approval of the Report or the Revised Report and, in its review, shall be guided by generally accepted scientific practices and principles.

IX. The Approved Report or the Approved Revised Report shall be attached hereto as Appendix "C". Such Report shall hereafter be referred to as the "Approved Report".

X. At any time during the course of or after the completion of the Field Investigation, the Commissioner of Environmental Conservation (the "Commissioner") will make a determination of whether the Site constitutes a significant threat to the environment, whether Respondent shall be required to undertake an inactive hazardous waste disposal site remedial program, and whether the Site should be reclassified on the Registry. Any such determination shall be provided to Respondent by the Department in writing.

XI. Within thirty (30) days after receipt of a determination by the Commissioner that the Site constitutes a significant threat to the environment, Respondent shall notify the Department in writing of its agreement or disagreement with said determination.

a. If Respondent agrees with said determination, and if Respondent consents to undertake an inactive hazardous waste disposal site remedial program, then this Order shall be

modified within thirty (30) days to include provisions for

the development and implementation of such remedial program

acceptable to the Department.

b. If Respondent disagrees with said determination, or

if Respondent does not consent to undertake an inactive

hazardous waste disposal site remedial program which is

approved by the Department, then the Department shall have

the right to pursue whatever relief may be legally available

to it, without prejudice to Respondent's right to contest the

same.

XII. Respondent shall meet the requirements for operation

of the industrial/commercial landfill at the site set forth

in Appendix "D", Operation Requirements.

XIII. The Department shall have the right to obtain "split

samples" or "duplicate samples" of all substances and

materials sampled by Respondent pursuant to this Order.

XIV. Respondent shall provide notice to the Department of

any excavating, drilling or sampling to be conducted pursuant

to the terms of this Order at least five (5) working days in

advance of such activities.

XV. Respondent shall permit any duly designated officer,

employee, consultant, contractor or agent of the Department

to enter, at reasonable times and upon reasonable notice,

except no notice will be required for regulatory inspections

at the landfill, upon the site or off-site areas in the

vicinity of the site which may be under the control of

Respondent for inspection purposes and for the purpose of



making or causing to be made such sampling and tests as the Department deems necessary, and for ascertaining Respondent's compliance with the provisions of this Order. Respondent shall have the right to obtain "split samples" or "duplicate samples" of all substances and materials sampled by the Department.

XVI. Respondent shall make all reasonable attempts to obtain whatever permits, easements, rights-of-way, rights-of-entry, approvals or authorizations which are necessary in order to perform the Field Investigation and all of Respondent's other obligations pursuant to this Order.

XVII. Respondent shall retain a third-party professional consultant, contractor and/or laboratory to perform the technical, engineering and analytical obligations required by this Order.

XVIII. Respondent shall not suffer any penalty under any of the terms of this Order or be subject to any proceedings or actions for any remedy or relief, if it cannot comply with any requirements of the provisions hereof because of an act of God, war, riot, strike, catastrophe, or other condition as to which negligence or willful misconduct on the part of Respondent was not a proximate cause, provided, however, that Respondent shall immediately notify the Department in writing when it obtains knowledge of any such condition and request an extension or modification of the terms of this Order.

XIX. Within thirty (30) days of the Department's approval of the Field Investigation Report, Respondent shall pay to

the Department a sum of money which shall represent payment for the Department's expenses for analytical costs and contractor costs incurred by the State of New York for sampling and analysis of samples taken by the Department during the Field Investigation. Such payment shall be to the Hazardous Waste Remedial Fund.

XX. The failure of Respondent to comply with the terms of this Order shall constitute a default and a failure to perform an obligation under this Order and under the ECL.

XXI. Nothing contained in this Order shall be construed as barring, diminishing, adjudicating or in any way affecting (1) any legal or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against anyone other than Respondent, its directors, officers, employees, servants, agents, successors and assigns; (2) the Department's right to enforce, at law or in equity, the terms and conditions of this Order against Respondent, its directors, officers, employees, servants, agents, successors and assigns in the event that Respondent shall fail to fulfill its obligation under the Order; and (3) the Department's right to bring any action, at law or in equity against Respondent, and its successors and assigns with respect to remediation or restoration areas or resources that may have been affected or contaminated as a result of the release or migration of hazardous wastes from the Site.

XXII. The Department hereby agrees not to seek penalties or commence any action or proceeding in connection with,

relating to, or arising out of Respondent's past disposal of hazardous wastes at the Site, except as reserved in Paragraph XX above, or Respondent's past, present or future operation of the Site as an industrial waste landfill as long as Respondent: (1) complies with the terms of this Order; (2) meets the requirements for operation of the Site set forth in Appendix "D"; and, (3) there is no disagreement under Paragraph XI of this Order. The terms of this Order shall not be construed to prohibit the Commissioner or his duly authorized representative from exercising any summary abatement powers, either at common law or as granted pursuant to statute or regulation.

XXIII. Respondent shall indemnify and hold the Department, the State of New York, and their representatives and employees harmless for all claims, suits, actions, damages and costs of every name and description (collectively, "Liabilities") arising out of or resulting from the fulfillment or attempted fulfillment of the terms hereof by Respondent, its directors, officers, employees, servants, agents, successors or assigns, except that Respondent shall not indemnify and hold the Department, the State of New York, and their representatives harmless for Liabilities to third parties arising from specific actions, if any, which the Department may require Respondent to take despite Respondent's reasonable objections that such actions foreseeably could give rise to Liabilities from third parties.

XXIV. The effective date of this Order shall be the date

this Order is signed by the Commissioner.

XXV. If, for any reason, Respondent desires that any term of this Order be changed, Respondent shall make timely written application therefor to the Commissioner, setting forth reasonable grounds for the relief sought.

XXVI. Within thirty (30) days after the effective date of this Order, Respondent shall file a Declaration of Covenants and Restrictions with the Jefferson County Clerk's Office, for the purpose of providing notice of this Order to all potential future purchasers of any portion of the Site. Said Declaration must indicate that any successor in title to any portion of the Site shall be responsible for implementing the provisions of this Order. A certified copy of said filing shall be provided to the Department.

XXVII. In the event that Respondent proposes to convey the whole or any part of its ownership interest in the Site, Respondent shall, not less than thirty (30) days prior to the consummation of such proposed conveyance, notify the Department in writing of the identity of the transferee and of the nature and date of the proposed conveyance. In advance of such proposed conveyance, Respondent shall notify the transferee in writing, with a copy to the Department, of the applicability of this Order.

XXVIII. A. All communication required by this Order is to be made between the Department and Respondent shall be made in writing and transmitted by United States Postal Service Return Receipt Requested or hand delivered to the address at

listed hereunder.

B. Communication to be made from Respondent to the Department shall be made as follows:

1. Two copies to the Division of Solid and Hazardous Waste, Room 209, 50 Wolf Road, Albany, New York 12233, Attention: Director.

2. Two copies to Director, Division of Environmental Enforcement, Room 618, 50 Wolf Road, Albany, New York 12233.

3. Two copies to the Regional Director, Region 6, 317 Washington Street, Watertown, New York 13601.

4. Two copies to the New York State Department of Health, Empire State Plaza, Corning Tower, Albany, New York 12237, Attention: Ronald Tramontano.

C. Communication to be made from the Department to Respondent shall be made as follows:

Mr. Michael G. Souva  
Manager, Plant Engineering  
Dynapower and Stratopower  
Starbuck Avenue  
Watertown, New York 13601

D. The Department and Respondent respectively reserve the right to designate other or different addresses on notice to the other.

XXIX. The terms of this Order shall be deemed to bind Respondent, its officers, directors, agents, servants, employees, successors and assigns.

XXX. Nothing herein shall be construed to bind any entity

Notary Public

not specifically bound by the terms of this Order.

XXXI. The provisions hereof shall constitute the complete and entire Order between Respondent and the Department concerning the Site. No terms, conditions, understandings or agreements purporting to modify or vary the terms hereof shall be binding unless made in writing and subscribed by the party to be bound. No informal advice, guidance, suggestions or comments by the Department regarding reports, proposals, plans, specifications, schedules or any other writing submitted by Respondent shall be construed as relieving Respondent of its obligations to obtain such formal approvals as may be required by this Order.

DATED:                      , New York  
                              , 198\_\_

HENRY G. WILLIAMS  
Commissioner  
New York State Department of  
Environmental Conservation

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0004 F  
02-8710-42

OSRIRF 10/12/87  
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PRELIMINARY ASSESSMENT  
OFF SITE RECONNAISSANCE  
INFORMATION REPORTING FORM

Date: Nov. 2, 1987

Site Name: NY AIR BRAISE CO. TDD: 02-8710-42

Site Address: Starbuck Rd  
Street, Box, etc.

Watertown  
Town

Jefferson  
County

New York  
State

NUS Personnel:	Name	Discipline
	<u>Jane Bullis</u>	<u>Env. Scientist</u>
	<u>Sue Kennedy</u>	<u>Env. Scientist</u>

Weather Conditions (clear, cloudy, rain, snow, etc.):

Clear Sunny 65° F

Estimated wind direction and wind speed: 10 mph S

Estimated temperature: 65° F

Signature: Jane Bullis Date: 11/2/87

Countersigned: Susan Kennedy Date: 11/2/87



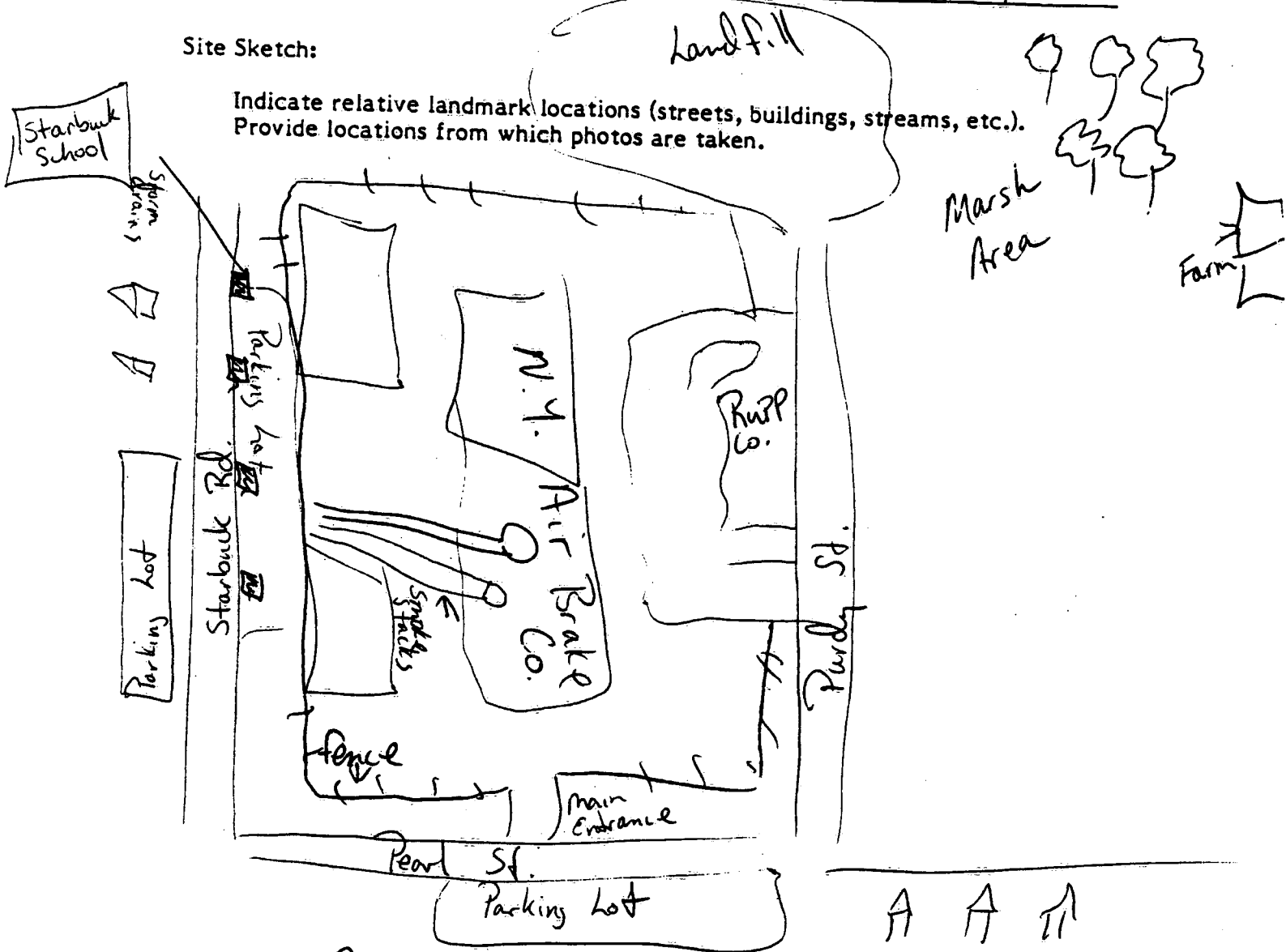
PRELIMINARY ASSESSMENT  
INFORMATION REPORTING FORM

Date: Nov. 2, 1987

Site Name: N.Y. Air Brake Co. TDD: 02-8710-42

Site Sketch:

Indicate relative landmark locations (streets, buildings, streams, etc.).  
Provide locations from which photos are taken.



Signature: Jane Bullin

Date: Nov. 2, 1987

Countersigned: Susan Kessner

Date: 11/2/87

PRELIMINARY ASSESSMENT  
INFORMATION REPORTING FORM

Date: Nov. 2, 1987

Site Name: N.Y. Air Brake Co.

TDD: 02-8710-42

Notes (Periodically indicate time of entries in military time):

Arrive at site 1400<sup>00</sup> 1500

Site takes up total block between  
Starbuck Rd and Purdy Rd.

Entire site fenced - main entrance  
has guard gate.

Homes are located across the street on  
Starbuck and Pearl

Two smoke stacks on-site one of which  
emitting smoke

Storm drains are located along the parking lot  
on the N.Y. Air Brake side of Starbuck Ave

Signature: Jane Bullis  
Countersignature: Super Kexreg

Date: 11/2/87  
Date: 11/2/87

PRELIMINARY ASSESSMENT  
INFORMATION REPORTING FORM

Date: Nov. 2 1987

Site Name: N.Y. Air Brake Co.

TDD: 02-8710-42

Photolog:

Frame/Photo Number	Date	Time	Photographer	Description
<u>IP-11</u>	<u>11/2/87</u>	<u>1520</u>	<u>S. Bullis</u>	<u>Looking East at N.Y. Air Brake</u> <u>along Starbuck Ave</u>
<u>IP-12</u>	<u>11/2/87</u>	<u>1521</u>	<u>S. Bullis</u>	<u>Looking East at N.Y. Air Brake</u> <u>along Starbuck Ave</u>
<u>IP-13</u>	<u>11/2/87</u>	<u>1522</u>	<u>S. Bullis</u>	<u>Looking East at N.Y. Air Brake</u> <u>along Starbuck Ave</u>
<u>IP-15</u>	<u>11/2/87</u>	<u>1540</u>	<u>S. Bullis</u>	<u>Looking North at Main</u> <u>Gate on Pearl St.</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Attach additional sheets if necessary. Provide site name, TDD number, signature, and countersignature on each.

Signature: Jane Bullis  
Countersignature: Susan Kexreg

Date: 11/2/87  
Date: 11/2/87

# PRELIMINARY ASSESSMENT INFORMATION REPORTING FORM

Date: \_\_\_\_\_

Site Name: \_\_\_\_\_

TDD: \_\_\_\_\_

**Notes (Cont'd):**

A hand-drawn graph of a sigmoid curve on lined paper. The curve starts at the bottom left, rises steeply in the middle, and levels off towards the top right, resembling an S-shape.

Attach additional sheets if necessary. Provide site name, TDD number, signature, and countersignature on each.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Countersignature: \_\_\_\_\_

Date: \_\_\_\_\_

# PRELIMINARY ASSESSMENT INFORMATION REPORTING FORM

Date: \_\_\_\_\_

Site Name: \_\_\_\_\_

TDD: \_\_\_\_\_

Notes (Cont'd):

A hand-drawn graph on lined paper. The graph features a smooth, S-shaped curve that starts at the bottom left, rises steeply in the middle, and levels off towards the top right, resembling a logistic growth curve. The curve is drawn with a single continuous line.

Attach additional sheets if necessary. Provide site name, TDD number, signature, and countersignature on each.

Signature: \_\_\_\_\_

**Date:** \_\_\_\_\_

Countersignature: \_\_\_\_\_

Date: \_\_\_\_\_